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*Attorneys for Defendant
Zhejiang Huahai Pharmaceutical Co., Ltd.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

| | | |
|---|---|------------------------------------|
| | : | Civil Action No. |
| | : | 1:19-MD-02875-RBL-JS |
| | : | |
| IN RE: Valsartan Products Liability Litigation | : | NOTICE OF MOTION TO QUASH |
| | : | SERVICE OF SUMMONS AND |
| | : | COMPLAINT UPON DEFENDANT |
| | : | PURSUANT TO FED. R. CIV. P. |
| | : | 12(b)(5) |

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PLEASE TAKE NOTICE that on March 12, 2019, or as soon thereafter, defendant Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), appearing specially through its undersigned attorneys, will move before this Court for an Order quashing the attempted service of process upon ZHP pursuant to Fed. R. Civ. Rule 12(b)(5), in the *Sen v. ZHP, et al.*, *Silberman v. Solco Healthcare U.S., LLC et al.*, and *Harper v. ZHP, et al.* actions.

PLEASE TAKE FURTHER NOTICE that ZHP will rely upon the Memorandum of Law, and the Declaration of Minfa Wang and Exhibits attached thereto and submitted herewith.

PLEASE TAKE FURTHER NOTICE that a Proposed Form of Order is submitted herewith for the Court’s consideration.

Dated: March 12, 2019

Respectfully submitted,

/s/ Seth A. Goldberg
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